



Lifting Children and Families Out of Poverty Task Force

SEPTEMBER 26, 2018

Today's Agenda

- I. Welcome and Introductions
- II. Recap of August Meeting, Community Meetings and Overview of Today's Agenda
- III. Strategies to Reduce Deep Child Poverty and Child Poverty
Housing and Homelessness, Education, Workforce and Training, & Special Populations Subcommittees
- IV. Recommendations to Date & the Report
- V. Public Comment
- VI. Wrap Up & Next Steps

Visit the CDSS Website for
Meeting Materials:

<http://www.cdss.ca.gov/inforesources/CDSS-Programs/Poverty-Task-Force>

Community Meetings

Facilitated by Dr. Cheryl Grills, Loyola Marymount University & Karren Lane

Los Angeles - June 7, 2018 at St. John's Well Child & Family Center: 95 adults and youth in attendance and representation from 21 community and faith-based organizations.

Fresno Economic Opportunities Commission: 74 community members in attendance and representation from 18 community-based organizations, including direct service organizations and law enforcement.

Oakland : September 20 at the Asian Cultural Center

Themes: Housing, need for more public assistance, education and expanded learning supports, youth employment and training, safety and community, health and nutrition, and reframing the discussion on poverty.

Housing & Homeless Subcommittee, Phil Ansell

Shallow Rent Subsidies

- ❖ **Problem:** Many families with children are unable to pay the full cost of rent but there are insufficient rental subsidies available to meet the need.
- ❖ **Proposal:** Provide shallow rental subsidies for certain families with children. Subsidies could be time-limited or ongoing. Program could also target families with young children, or with very low incomes, or be limited to extremely high-cost areas.
- ❖ **Other dimensions of policy that are relevant:** Given high costs, program should be targeted to areas with high rents – for example places where median rents require more than 50% of annual income of a minimum wage worker.
- ❖ **Reach:** Depends on how targeted. According to the ACS, about 300,000 families with children live in high cost coastal counties (Bay Area and So. California) that have incomes less than the FPL and who pay cash rent. About 115,000 living in high-cost coastal counties are in deep poverty, and 45,000 living in high-cost coastal counties are in deep poverty and have at least 1 child under 5 years of age.
- ❖ **New or Expanded:** New state program.
- ❖ **Cost estimate:** Assuming \$500 per month subsidy and 10 percent administrative cost, annual cost would be \$6,600 per family served. For each 10,000 served, annual costs would be \$66 million. Cost depends on how the program is structured.
- ❖ **Ramp up/Implementation:** State would issue guidelines to counties, and counties would determine how to implement program.
- ❖ **Options for modifying:** Limiting the amount and duration of subsidy; establishing more stringent criteria for a family to qualify.

Family Reunification

- ❖ **Problem:** While a child cannot be removed from their parents due to homelessness, a child that has been separated for other reasons cannot be returned to a parent that is homeless. This causes longer separations or termination of parental rights.
- ❖ **Proposal:** Expand the Bringing Families Home Program (BFHP) statewide. The BFHP is a pilot program in 12 counties that helps child-welfare-involved families who are homeless to find housing through rapid rehousing (rental subsidy plus intensive case management), HUD vouchers, or permanent supportive housing.
- ❖ **Other dimensions of policy that are relevant:** Families involved in the child welfare system are disproportionately people of color. Additionally, this could be one of the few housing assistance programs that undocumented families would be eligible for.
- ❖ **New or Expanded:** Expansion of pilot (potentially with a few tweaks).
- ❖ **Research/evidence:** CDSS is working with UC Berkeley and the Children's Data Network to evaluate BFHP— results are due in the next 18 months.
- ❖ **Cost estimate:** State annual costs in range of \$30 to \$40 million (preliminary estimate), plus county match. (Assumes pilot program is expanded slightly to include unstably housed families).
- ❖ **Ramp up/Implementation:** The 12 counties currently in the pilot program would reapply for additional funds. New counties would submit an application, be given a 6-9 month planning allocation, and then be allocated the full amount.
- ❖ **Options for modifying:** Could limit costs by narrowing program to only homeless family reunification cases.

Prohibit Section 8 Housing Discrimination

- ❖ **Problem:** Families receiving Section 8 vouchers (and other housing vouchers) are often unable to find a landlord that will accept it (for many reasons, including the fact that vouchers are not keeping up with rental markets. This leaves Section 8 vouchers unused and families without adequate housing.
- ❖ **Proposal:** Include “source of income” in the State’s list of tenant characteristics that are protected from discrimination.
- ❖ **Target population:** Children/families in poverty and deep poverty.
- ❖ **Other dimensions of policy that are relevant:** This would extent protections to other subsidies, beyond Section 8. There are large racial disparities among those experiencing homelessness and housing instability. The additional protection would address some of this disparity.
- ❖ **Reach:** Would potentially affect all families receiving Section 8 vouchers and other publicly-funded rental subsidies.
- ❖ **New or Expanded:** New tenant “characteristic” protected from discrimination.
- ❖ **Cost estimate:** Modest increases in landlord/tenant education costs and enforcement costs.
- ❖ **Ramp up/Implementation:** Legal change, would require some landlord and tenant education

Long-Term Housing Subsidies With Services for Homeless Families With Children

- ❖ **Problem:** Homeless families face enormous challenges and are more likely to become involved in the child-welfare system. Many need more than rapid-rehousing.
- ❖ **Other dimensions of policy that are relevant:** Homeless families are disproportionately African-American.
- ❖ **Reach:** 2,000 families.
- ❖ **New or Expanded:** New program.
- ❖ **Research/evidence:** HUD Family Options Study, which shows that families receiving ongoing rental assistance are far more likely to exit and stay out of homelessness.
- ❖ **Cost estimate:** \$24 million per year when fully implemented.
- ❖ **Ramp up/Implementation:** Could start at 500 families and ramp up as program proves itself.
- ❖ **Options for modifying:** Reduce number of families served.

Landlord Incentives

- ❖ **Problem:** Landlords are frequently unwilling to rent to homeless/poor families with children, particularly in tight housing markets. Landlords may be concerned that the family will not be able to sustain the rent, or may damage the unit, particularly if the family has a history of evictions.
- ❖ **Proposal:** State would provide funding for counties to offer incentives to landlords who agree to rent to a homeless/poor family with a rental subsidy. Specific incentives could include a holding fee to pay rent while the unit is vacant, and a damage mitigation fund in the event there is damage to the unit in excess of the security deposit.
- ❖ **Other dimensions of policy that are relevant:** Greatest impacts would likely be in urban areas with tight rental housing markets.
- ❖ **Reach:** Potentially 5,000 to 10,000 families per year.
- ❖ **New or Expanded:** New at State level. Some localities have implemented similar programs.
- ❖ **Research/evidence:** Los Angeles has had success with a similar program for homeless families/adults seeking permanent supportive housing with a federal rental subsidy.
- ❖ **Cost estimate:** \$15-\$30 million per year, based on an average cost of \$3,000 per family and 5,000 to 10,000 families served.
- ❖ **Ramp up/Implementation:** State allocates to counties by formula. (Counties could be required to submit plans to receive their allocation.) Counties would design their programs. Costs would ramp up during initial 1-2 years then remain stable.
- ❖ **Options for modifying:** Could be limited to families in deep poverty and/or limited to certain categories of rental subsidies.

Eviction Defense

- ❖ **Problem:** Unlike in criminal court, in civil court, poor people have no right to an attorney. Accordingly, in housing courts around the country, most landlords have attorneys and most tenants do not. There is currently no centralized statewide or local system to provide free or reduced-cost legal representation for low-income Californians facing eviction.
- ❖ **Proposal:** Provide State funding to support eviction court representation for low income families with children facing eviction.
- ❖ **Other dimensions of policy that are relevant:** Low income families in California face risk of eviction due to the competitive housing market.
- ❖ **Reach:** Unknown, potentially in the tens of thousands of families annually.
- ❖ **New or Expanded:** New State program. San Francisco recently passed local ordinance that would do something similar.
- ❖ **Research/evidence:** Pew Charitable Trusts has written in favor of these services.
- ❖ **Cost estimate:** Likely low tens of millions of dollars if fully implemented statewide.
- ❖ **Ramp up/Implementation:** Program could start as a pilot in counties that have identified a high eviction rate.
- ❖ **Options for modifying:** Could hire fewer full time attorneys and rely partly on volunteer services.

Questions for Task Force

❖ **Should Housing and Homelessness Subcommittee develop three additional proposals in the following areas:**

- State imposed rent control on certain local jurisdictions.
- Housing supply package.
- Housing vouchers for young adults graduating from Extended Foster Care.

State Imposed Rent Control In Certain Local Jurisdictions

- ❖ **Problem:** California has among the highest rental costs in the nation, and low-income households are heavily impacted.
- ❖ **Details:** Such a proposal could authorize the State Department of Housing and Community Development to temporarily impose rent control in local jurisdictions that:
 - have fallen significantly behind their lower-income regional housing needs allocation,
 - are experiencing significant rent increases among lower-priced units, and/or
 - face non-regulatory impediments to development of new supply within a specified period of time. The proposal could be paired with a housing supply recommendation (see next slide).
- ❖ **Target:** Rent control would apply to all households in covered units; otherwise, it would create a strong disincentive toward low-income families with children.

Housing Supply Package

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- ❖ **Problem:** Low-income families face a shortage of housing and soaring rents. A large part of the problem is that growth in the State's housing supply has consistently lagged behind growth in the State's population. According to a recent assessment by California HCD, over 95 percent of local jurisdictions in the State have fallen behind the housing goals established in their regional housing needs allocation.
 - ❖ The measures would apply to localities that have fallen significantly short of their low-income housing goals, and could involve:
 - Requirements that localities reduce zoning and regulatory requirements for low-income housing, particularly in infill and transit-adjacent areas.
 - Requirements that existing State and local funding sources for housing prioritize projects that involve high-density and affordable housing.
 - Modifications of existing provisions in State law relating to density bonuses, with the goal of encouraging more set-asides for affordable housing.
 - Prioritizing the development process in areas with low median incomes, especially on transit-adjacent and city-owned or public land.
 - ❖ **Target population:** Proposals would be designed to help all segments of the housing market, but would place a special emphasis on housing that benefits low and very low income families.

Housing Vouchers For Young Adults Aging Out Of Extended Foster Care

- ❖ **Problem:** Young adults aging out of the Extended Foster Care program at age 22 are often unable to secure housing due to their lack of adequate funds in California's competitive housing market.
- ❖ **Question for TF:** Should the Housing and Homelessness subcommittee develop a proposal to provide housing vouchers for these young adults until their 26th birthday?
- ❖ **Cost estimate:** About 12 million in first year ramping up to \$48 million in fourth year, then flat. (Assumes 1,000 young adults age out each year and monthly voucher of \$1,000).
- ❖ **Other dimensions of policy that are relevant:** Should the program be means tested?

Education, Workforce, & Training Subcommittee, Dan Rounds

Education, Workforce & Training

- ❖ Establish a new priority of service requirement for parents in poverty participating in workforce and training programs
- ❖ Strengthen connectivity and coordination of workforce and training programs at the local and state levels
- ❖ Increase the investment/supplement/per pupil spending on low-income children in the Local Control Funding Formula. This must be paired with expected outcomes for educational institutions to strengthen family engagement, provide more full-day opportunities, and leverage community resources
- ❖ Increase preapprenticeship, apprenticeship, and summer employment opportunities for youth in poverty
- ❖ Provide a dedicated source of state funds for supportive services for those participating in workforce and education programs to ensure that participants can complete programs
- ❖ Ensure all California residents in poverty have a greater ability to participate in the workforce by requiring the entities responsible for licensing and credentialing various occupations to authorize the use of an individual tax ID number in lieu of a SSN

New Priority of Service Requirement in Workforce and Training programs

- ❖ **Target population:** Underemployed or job-seeking parents in low-income households. Specific subpopulations served by the aforementioned grants include individuals with minimal prior work experience who are trying to enter the workforce, low-skilled workers seeking to improve skills, the long-term unemployed, armed service veterans, immigrant or migrant workers, and formerly incarcerated individuals transitioning back to the workforce, among others.
- ❖ **New or Expanded:** Expanded
- ❖ **Research/evidence:** Evidence for sector-based programs —providing both training and placement services designed to prepare participants for jobs in sectors with local labor market demand—is thinner but more promising than is the mixed evidence for traditional vocational programs.
- ❖ **Cost estimate:** From tens of millions up to \$600 million to fully replace federal fund reductions. (Cost of \$500 to \$1,500 per person served – approximately 100,000 currently served).
- ❖ **Options for modifying:** Incremental phase in to reinvest to pre-recession levels by 20XX

Strengthen Coordination of Workforce and Training programs

- ❖ **Target population:** Job seekers and employed (or underemployed) workers
- ❖ **Other dimensions of policy that are relevant:** Funding is needed to support coordination of services for populations with barriers to employment, such as homeless individuals and families, and require shared responsibility for shared outcomes to ensure that programs affecting relevant individuals learn to work outside of operational silos and programmatic funding streams.
- ❖ **New or Expanded:** Expanded
- ❖ **Cost estimate:** Initial costs of \$1-\$3 million for planning and scoping. Potentially major future costs for IT.

Increase the investment in per pupil spending on low-income children in LCFF

- ❖ **Target population:** K-12 students in low-income school districts.
- ❖ **New or Expanded:** Expanded. Must be paired with expected outcomes for educational institutions to strengthen family engagement, provide more full-day opportunities, and leverage community resources.
- ❖ **Research/evidence:** Sustained funding increases substantially improve student academic achievement, especially for low-income school districts
- ❖ **Cost estimate:** Cost depends on size of supplement and whether it is a reallocation within Proposition 98 or an augmentation to Proposition 98

Increase preapprenticeship, apprenticeship, and summer employment opportunities for youth

- ❖ **Target population:** Low-income youth and young adults
- ❖ **New or Expanded:** Expanded
- ❖ **Research/evidence:** Strong evidence that such programs improve labor market outcomes for years beyond program participation
- ❖ **Cost estimate:** Potentially tens of millions, depending on how many people served.

Provide a dedicated source of state funds for supportive services for those participating in workforce and education programs

- ❖ **Target population:** Participants in federally- and state-funded workforce and training programs. Dan, please verify that this is what you had in mind—I was guessing it would be all publicly funded programs but not privately funded.
- ❖ **New or Expanded:** Expanded
- ❖ **Research/evidence:** Consistent with findings about common reasons for not completing programs
- ❖ **Cost estimate:** Depends on how many people served (\$500 to \$1,500 per person served).
- ❖ **Options for modifying:** Maximize/leverage existing CalWORKs and CalFresh Employment and Training Funds

Require the entities responsible for licensing and credentialing various occupations to authorize the use of an individual tax ID number in lieu of a SSN

- ❖ **Problem:** Would improve economic mobility for immigrant workforce, by removing barriers to access certain professions
- ❖ **Target population:** Immigrant Integration strategy
- ❖ **New or Expanded:** New
- ❖ **Cost estimate:** Administrative costs

Special Populations Subcommittee, Shimica Gaskins

Overview of Recommendations

- ❖ Adequate and appropriate housing for Transition Age Youth (TAY) and nonminor dependents (NMD)
- ❖ Waiver of Outstanding Juvenile Fees
- ❖ Fully Fund the Youth Reinvestment
- ❖ Post-Secondary Education for Justice Involved Youth and Foster Youth
- ❖ Transition Support for Justice Involved Youth
- ❖ Improve Juvenile Justice Data Systems
- ❖ Expansion of the Child Care Bridge
- ❖ Promoting placement and school stability for foster and homeless children and youth
- ❖ Creating and Expanding Kinship Navigator Programs

Adequate and appropriate housing for Transition Age Youth (TAY) and nonminor dependents (NMD)

- ❖ **Description:** Transition age youth (TAY), current or former dependents or wards of the juvenile court who are between the ages of 16 and 24 and nonminor dependents (NMD), current or former dependents or wards of the juvenile court who are between 18 and 21 years of age, are in foster care, and are participating in a transitional independent living case plan pursuant to the federal Fostering Connections Act, are at significant risk of chronic homelessness, decreased educational and employment outcomes, increased likelihood of poverty and increased likelihood of interaction with the justice system if they are not supported as they transition from childhood to adulthood and strive to achieve self-sufficiency.
- ❖ **Target Population:** Children/families in deep poverty, Children/families in poverty but not deep poverty, Children/families at risk of poverty but not in poverty, Children/families without regard to income or poverty status.
- ❖ **Cost:** Providing an additional 4,000 THP-Plus spots is approximately \$160 million annually.

Waiver of Outstanding Juvenile Fees

- ❖ Description: Youth that have been involved in the criminal justice system -- whether through arrest or incarceration are often burdened with extensive fines and fees related to the offense. These fines and fees keep youth and their families that already have limited income in poverty. Our research shows that juvenile fees are extremely harmful to families, frequently implemented unlawfully, and costly for counties to administer. SB 190 was passed in 2017 to address this issue by limiting the fines
 - This policy would be an addendum to SB 190 that passed in 2017 and went into effect in January 2018. It would waive or forgiveness of any outstanding debt related to fines and fees.
- ❖ Target Population: Children/families without regard to income or poverty status.
- ❖ Cost: No costs from state budget

Fully Fund Youth Reinvestment

- ❖ Description: This would be a budget ask to provide additional general fund dollars to support diversion programming. The goal is reducing unnecessary youth contact with the juvenile justice system
- ❖ Target Population: Children/families in deep poverty, Children/families in poverty but not deep poverty, Children/families at risk of poverty but not in poverty, Children/families without regard to income or poverty status.
- ❖ Cost: Estimated \$63 million

Post-Secondary Education for Justice Involved Youth and Foster Youth

- ❖ Description: All students who have obtained their high school diploma or equivalent while detained have the option to enroll in a college course and/or a CTE program. Students eligible for vocational education and college education must be given the same opportunities to access post-secondary education opportunities as students in the community. Eventually, this policy could expand to provide dual-enrollment and college counseling/financial aid counseling to those youth not yet eligible to enroll full-time in post-secondary schools.
- ❖ Target Population: Children/families in deep poverty, Children/families in poverty but not deep poverty, Children/families at risk of poverty but not in poverty, Children/families without regard to income or poverty status.
- ❖ Cost: Estimated at potentially \$11.5 million annually.

Transition Support for Justice Involved Youth

- ❖ Brief Description: Current state laws do not assign responsibility of students' re-entry transitions to a singular agency due to the nature of multi-agency collaboration that is required for re-entry. School districts must be a required party to joint transition plans that are currently only mandatory for COEs and County Probation Departments. County Offices of Education are assigned the role of high school or post-secondary school enrollment. County agency dedicated to labor or workforce development is responsible for securing employment transitions.
- ❖ Target Population: Children/families in deep poverty, Children/families in poverty but not deep poverty, Children/families at risk of poverty but not in poverty, Children/families without regard to income or poverty status.
- ❖ Cost: Administrative costs

Improve Juvenile Justice Data Systems

- ❖ Brief Description: Fully fund recommendations made by the CA Juvenile Justice Data Working Group in 2016 to replace the JCPSS, consolidate state-level data collection in one agency, expand range of outcome data collected, and establish a web-based CA juvenile justice data clearinghouse.
- ❖ Target Population: Children/families in deep poverty, Children/families in poverty but not deep poverty, Children/families at risk of poverty but not in poverty, Children/families without regard to income or poverty status.
- ❖ Cost: At least \$1-3 million to develop a cost plan

Expansion of the Child Care Bridge

- ❖ Description: The child care bridge (Bridge) program is \$31 million in state funds for counties to help caregivers access temporary child care, until they can find longer-term accommodations. The Bridge Program aims to increase the number of foster children successfully placed in home-based family care settings, increase capacity of child care programs to meet the needs of foster children in their care, and maximize funding to support the child care needs of eligible families.
- ❖ Target Population: Children/families in deep poverty, Children/families in poverty but not deep poverty, Children/families at risk of poverty but not in poverty, Children/families without regard to income or poverty status.
- ❖ Cost:
 - Cost estimate of expanding the Bridge Program to all eligible children ages 0 – 12 = \$85 million
 - Cost estimate of expanding the Bridge Program to all eligible children ages 0 – 3 = \$45 million.

Promoting placement and school stability for foster and homeless children and youth

- ❖ Description: Require county child welfare, probation, and behavioral health agencies to establish county-based Family Urgent Response Systems for the provision of mobile crisis-response services to current or former foster youth and their caregivers, and require CDSS to establish a statewide hotline, to be available 24 hours per day, seven days per week to respond to caregiver or youth calls when a crisis arises.
- ❖ Target Population: Children/families in deep poverty, Children/families in poverty but not deep poverty, Children/families at risk of poverty but not in poverty, Children/families without regard to income or poverty status.
- ❖ Cost
 - 1) Estimated first-year costs of \$15 million (General Fund) to CDSS to establish the statewide hotline and implement mobile response services.
 - 2) Estimated ongoing annual total costs of \$30 million (General Fund) to CDSS to maintain the system -- approximately \$2.3 million to staff and administer the hotline, and \$27.7 million for county mobile response teams. The total cost estimate assumes, once the system is established, at least 80% of county response services would be eligible for matching funds under the federal Medicaid program.

Creating and Expanding Kinship Navigator Programs

- ❖ Description: We propose developing a 5-year pilot to implement and study the effectiveness of Kinship Navigator programs across California with the goal of identifying programs that meet the well-supported evidence standard under federal law so that we can begin to utilize federal dollars for the operation and expansion of Kinship Navigator programs across the state.
- ❖ Target Population: Children/families in deep poverty, Children/families in poverty but not deep poverty, Children/families at risk of poverty but not in poverty, Children/families without regard to income or poverty status.
- ❖ Cost:
 - Currently, Kinship Support Services Programs operate in 17 counties at an annual cost of \$6,000,000.
 - Our proposal would be that the state invest an additional \$6,000,000 over the next 3 – 4 years
 - The estimated cost of running kinship navigators statewide would be \$18,000,000 but 50% of the costs would be borne by the federal government once we have established the evidence base for the operation of those programs.

Additional Recommendations for Consideration

- ❖ Children with an Incarcerated or Formerly Justice Involved Parent
- ❖ Trafficked Youth
- ❖ Housing for Foster Youth enrolled in Community College

The Report

WIC 20055

- (1) The **success achieved over the eight-year period prior to completion of the report**, for each program and service determined by the task force to be of the highest importance in reducing both childhood poverty and the number of children in deep poverty, and recommendations that may build on that success.
- (2) An **analysis of unmet needs among children in deep poverty and poverty**, if any, for each of the programs and services determined by the task force to be of the highest importance in reducing childhood poverty.
- (3) A **specific set of near-term, intermediate term, and long-term benchmarks that can be used to measure the state's progress** toward the goal of addressing child poverty.
- (4) The task force shall consider the needs and priorities for services, and make **recommendations intended to address deep poverty among children and reduce the number of children living in poverty**.

Past Investments

Housing

❖ **Established Several New Housing and Homeless Assistance Programs**

- **No Place Like Home** program: (est. 2016) dedicates up to \$2 billion in bond proceeds to invest in the development of permanent supportive housing for persons who are in need of mental health services and are experiencing homelessness, chronic homelessness, or who are at risk of chronic homelessness.
- **Homeless Emergency Aid** Program (HEAP): (est. 2018) \$500 million block grant program designed to provide direct assistance to cities, counties and Continuums of Care (CoCs) to address the homelessness crisis throughout California
- **CalWORKs Housing Support Program** – est. 2014-15 \$20M to \$71M in 2018-19 to assist homeless CalWORKs families in quickly obtaining permanent housing and to provide wrap-around supports to families to foster housing retention
- **Housing and Disability Advocacy Program** (SSI-eligible) - est. 2016 \$45M over 3 years + match
- **Bringing Families Home Program** (Child Welfare) – est. 2016 \$10M over 3 years + match

Cash Assistance

- ❖ **Minimum Wage Increases**
- ❖ **New State Earned Income Tax Credit**
- ❖ **Increasing Cash Assistance in CalWORKs:** increasing the monthly cash assistance amount for families; repealing the maximum family grant rule; extending CalWORKs eligibility; restoring the amount of earned income that is not counted against a CalWORKs participants grant; providing diaper benefits as a supportive service to families with children under 36 months of age (\$30 per child monthly);
- ❖ **CalFresh: SSI Cash-Out Reversal**

Early Learning

❖ **Increased Subsidized Slots**

- State Preschool - \$373.7M in 2011-2012 to \$1.1B in 2018-19
- Alternative Payment Program Vouchers – \$216.6M in 2011-2012 to \$529.7M in 2018-19
- Emergency Child Care Bridge - \$31M new investment – implementation in 2017-18

❖ **Significant Reimbursement Rate Increases** to those providing services to low-income families

❖ **Increased Quality Improvement Funding/Activities** - \$49.7M in 2011-2012 to \$116.8M in 2018-19

Recommendations

Next Steps
